UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA

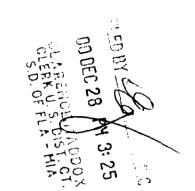
CASE NO. 00-6311-Cr-Huck

UNITED STATES OF AMERICA,

Plaintiff,

LARRY CRENSHAW and CLARENCE LARK.

Defendants.



MOTION FOR EXTENSION OF TIME TO FILE PRETRIAL MOTIONS

COME NOW the Defendants, Larry Crenshaw and Clarence Lark, and respectfully move for the entry of an Order extending the time for the filing of Pretrial Motions and in support thereof state:

- 1. Discovery in this matter, upon which to predicate pretrial motions, is incomplete and has virtually just begun. Undersigned counsel just received the first small packet of discovery information late last week.
- 2. Based upon the complexity of the charges and the number of defendants in this case the parties anticipate discovery to be voluminous.
- 3. A Status Conference in this matter is set for January 4, 2001 at 8:00 a.m. Based upon the seriousness of the charges, the estimated length of trial (70 trial days), and the number of defendants and defense lawyers and their schedules, without being presumptuous, undersigned counsel believe that the trial date to be established for this matter will be substantially in the future.

NON-COMPLIANCE OF SEA, Ca. L.R.



4. Undersigned counsel respectfully request that this matter be taken up at the Status Conference on January 4th after a trial date is established and the court is informed of the extensiveness of the discovery materials.

WHEREFORE, for the foregoing reasons, Defendants respectfully request this Honorable Court extend the deadline for the filing of pretrial motions and grant such other relief as it deems just and proper.

Respectfully submitted,

PAUL D. LAZARUS, P.A.

Attorney for Crenshaw 800 Brickell Avenue Penthouse Two Miami, FL 33131-2944 Telephone: 305-539-0606

Facsimile: 305-358-4010

BIERMAN, SHOHAT, LOEWY & KLEIN, P.A.

Attorneys for Lark 800 Brickell Avenue Penthouse Two Miami, FL 33131-2944 Telephone: 305-358-7000

Facsimile: 305-358-4010

Bv:

PAUL D. LAZARUS, ESQ. Florida Bar No. 242349

DONALD I. BIERMAN, ESQ. Florida Bar No. 093244

CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that a true and correct copy of this Motion was furnished by mail, on this 28th day of December, 2000, to: See attached Service List.

SERVICE LIST UNITED STATES v CLARENCE LARK CASE NO. 00-6311-Cr-Huck

Michael J. Dittoe, Esq. Assistant U.S. Attorney 500 East Broward Blvd. 7th Floor Fort Lauderdale, FL 33394

Guy Speigelman, Esquire Suite 400 28 West Flagler Street Miami, FL 33131

Reemberto Diaz, Esquire 1435 South Miami Avenue Miami, FL 33130

Bruce H. Lehr, Esquire 1401 Brickell Avenue Suite 810 Miami, FL 33131

James D. Henderson, Esquire 12121 Wilshire Blvd., Suite 1130 Los Angeles, CA 90025

Martin R. Raskin, Esquire Grove Forest Plaza, Suite 206 2937 S.W. 27 Avenue Miami, FL 33133